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11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN FRANCISCO DIVISION**

14 In re Alvarion Ltd. Securities Litigation

Case No. 3:07-cv-00374-JSW

**STIPULATION FOR DISMISSAL AND
[PROPOSED] ORDER THEREON**

Hon. Jeffrey S. White

19
20 **TO THIS HONORABLE COURT:**

21 Lead Plaintiffs Furkan M. Khan and Rahul Saraf (collectively, "Lead Plaintiffs") and
22 defendants Alvarion Ltd., Zvi Slonimsky, Dafna Gruber and Tzvika Friedman (collectively,
23 "Defendants"), hereby stipulate to the dismissal of this consolidated putative class action and
24 each complaint filed therein (the "Action") on the terms set forth below.

25 1. The Action shall be dismissed in its entirety pursuant to Rule 41(a) of the Federal
26 Rules of Civil Procedure. Each side shall bear its own fees and costs.

27 2. Lead Plaintiffs agree that they will not assert, in this or any other Court, any claims or
28 causes of action, of any kind whatsoever, whether known or unknown, which Lead Plaintiffs

1 may now have or have ever had, against any named defendant or their counsel, relating to or
2 arising out of or in connection with any of the claims, facts, matters, omissions or occurrences
3 referred to in, or that could have been raised in, or which are the subject matters of, the Action.
4 Nothing herein, however, shall preclude either Lead Plaintiff from being an unnamed class
5 member in any future litigation in which it may be a member of the putative class, or from
6 participating on the same terms as any other unnamed class member in such action.

7 3. Each Defendant hereby releases any claims or causes of action, of any kind
8 whatsoever, whether known or unknown, suspected or unsuspected, anticipated or unanticipated,
9 which it may now have or have ever had, or hereafter can, shall or may have against Lead
10 Plaintiffs and their counsel relating to or arising out of or in connection with the filing and
11 prosecution of the Action.

12 4. This dismissal is without prejudice to the rights of any other purported member of the
13 putative class alleged in this Action.

14 **DATED:** January 23, 2008

GLANCY BINKOW & GOLDBERG LLP

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*Attorneys for Lead Plaintiffs Furkan M. Khan and
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7 **DATED:** January 23, 2008

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*Attorneys for Defendants Alvarion Ltd., Zvi
Slonimsky, Dafna Gruber, and Tzvika Friedman*

15 **** ORDER ****

16 Pursuant to the foregoing stipulation, this consolidated putative shareholder class action
17 and each complaint filed therein are dismissed in their entirety on the terms set forth above and
18 without prejudice to any purported member of the putative class action alleged in the action.
19 Each side shall bear its own fees and costs. IT IS SO ORDERED.

20 Dated: January 24, 2008


The Honorable Jeffrey S. White
United States District Judge